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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

KALIAH BURNETT, an Individual,

Plaintiff,

DOLLAR GENERAL CORPORATION, a
Foreign Corporation.

Defendant.

Case No.: 2:18-cv-00724-GMN-CWH

**STIPULATION AND ORDER TO
STAY THE CASE AND EXTEND
TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S
COMPLAINT
(First Request)**

Pursuant to LR IA 6-1, LR 6-2, and 7-1, Plaintiff Kaliah Burnett (“Plaintiff”) and Defendant Dolgen Midwest, LLC dba Dollar General¹, (“Defendant”) (collectively the “Parties”), by and through their respective counsel hereby request and stipulate to stay the above-captioned matter while the Parties discuss the possibility of early resolution.

The purpose of the Stay is to promote judicial economy and allow this Court to more effectively control the disposition of the cases on its docket with economy of time and effort for itself, for counsel, and the litigants. *See Landis v. N. Am. Co.*, 299 U.S. 248, 254 (U.S. 1936) (“the

¹ Dolgen Midwest, LLC was improperly named as Dollar General Corporation.

1 power to stay proceedings is incidental to the power inherent in every court to control the
2 disposition of the causes on its docket with economy of time and effort for itself, for counsel, and
3 for litigants"); *Pate v. DePay Orthopedics, Inc.* 2012 WL 3532780, at * 2 (D. Nev. Aug. 14, 2012)
4 ("A trial court may, with propriety, find it is efficient for its own docket and the fairest course for
5 the parties to enter a stay of an action before it, pending resolution of independent proceedings
6 which bear upon the case"), *citing Leyva v. Certified Grocers of Cal., Ltd.* 593 F.2d 857, 863 (9th
7 Cir. 1979).

9 Counsel for Defendant were recently retained and made aware of the deadline to respond to
10 Plaintiff's Complaint. As the Parties would like to discuss the potential of early resolution, the
11 Parties agree and stipulate that this matter be stayed for thirty-one days, up to and including June
12 24, 2018. Should the Parties be unsuccessful, the Defendant will have up to and including
13 July 6, 2018, to file a response to Plaintiff's Complaint.

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1 This is the Parties' first request to stay and extend the time for Defendant to respond to
2 Plaintiff's Complaint. This stipulation is made in good faith and not for purposes of causing any
3 undue delay.

4 Dated this 29th day of May, 2018.

5 **HKM EMPLOYMENT ATTORNEYS LLP**

6 **OGLEETREE, DEAKINS, NASH, SMOAK
& STEWART, P.C.**

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14 **ORDER**

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16 **IT IS HEREBY ORDERED** that the Parties Stipulation and Order to stay the matter is
17 granted.

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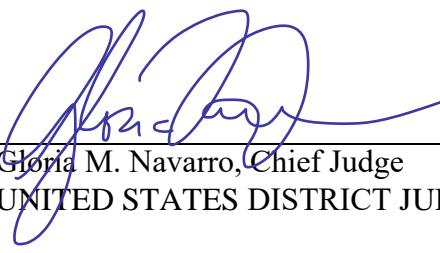
19 **IT IS FURTHER ORDERED** that the time for Defendant to file a response to Plaintiff's
Complaint is hereby extended to July 6, 2018.

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21 **IT IS SO ORDERED.**

22 DATED this 14 day of June, 2018.

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Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT JUDGE

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